INTERACTIVE SERVICE DESIGNS
7921 Grayson Rd. Harrisburg, PA. 17111
717-564-3550

Before the
Federal Communications Commission
Washington, D.C 20554

In the Matter of	}	**WT Docket No. 95-47**
	}	
Amendment of Part 95 of the	}	**RM-8476**
Commission's Rules to allow	}	
Interactive Video and Data	}	
Service licensees to provide	}	
mobile service to subscribers	}	

To: The Commission

Comments

Should the FCC limit mobile RTU's ERP to 100mw?

1. The proposed need to limit mobile RTU's ERP would only be necessary in areas that TV-13 operates. TV-13 is already protected under 47 CFR 95.861. Any interference would be a clear violation, licensees are required to analyze each MSA and must take whatever measures needed to prevent interference to TV-13. This rule would apply to mobile RTU's also.

2. By limiting mobile ERP to 100mw licensees would not be able to provide cost effective, reliable service to mobile RTU's.

3. The use of 100mw technology is far too complex for licensee's need to provide simple interactivity. This complexity will result in slow deployment of the IVDS, due to the high initial cost to licensees along with high operating cost. The net result will be a system most Americans will not be able to afford.

4. Although 100mw technology limited fixed tests have proven to be possible, in a mobile application these tests will not be as successful when given geographical, structural and meteorological obstacles.

5. If mobile RTU's are limited to 100mw ERP, EON's 100mw patent will enable them to prevent competition at the 100mw level, thus outside companies will not be able to supply cost effective systems with enough power to be feasible and competitive.

6. Can an effective system be designed to operate at less than 100mw ERP, will companies be able to design and supply mobile RTU's in compliance with EON's patent rights?

7. If the100mw limit is placed on mobile RTU's, growth of mobile IVDS will stagnate. The growth of mobile IVDS will not only depend on cost to licensees, but the end cost to consumers. Therefore IVDS must be as simple as possible to control cost to the public. By allowing more than 100mw ERP, the majority of consumers will have a greater choice of products and services, which will result in a more rapid deployment of total IVDS.

8. It is far too early to place additional limitations on mobile RTU's ERP when they are already regulated against interference to TV-13.

9. By drastically limiting mobile RTU's ERP to 100mw, it greatly decreases the amount of present and future technology that can be used in MSA's where TV-13 is not a factor.

Should the FCC continue to authorize 20 watts power for fixed RTU's?

1. At present much research and development is being pursued for IVDS applications with limits up to the allowable 20 watts ERP. There are many advantages to utilizing the existing permissible power level. Along with lower start-up costs, a significantly greater number of subscribers will have access to IVDS. It also allows more flexibility to the types of systems used for interactivity.

2. The wheels of IVDS have been rolling towards a common goal and by cutting the power to 1/200th of the original permissible level is unthinkable and is going to have reverberating effects on companies presently involved with research and development of systems utilizing RTU's with ERP of up to 20 watts. What will arise from such changes will be understood only after IVDS is analyzed on why it failed.

3. What we are proposing is not even close to EON's complexity. In addition the 100mw strategy is exactly that, a strategy to control revenues and services for the usage of IVDS. To effectively deploy the possibilities of IVDS, we must put the public before profits. Only then can IVDS help solve the social, economical and educational problems we are facing today.

4. To make such an amendment to 47 CFR 95.855 would be devastating to the industry. EON has the only known 100mw system available to date and licensees would be forced by the FCC to enter into a contract with EON to meet their 10% first year build-out requirements. It is also not proven that EON's 100mw system works beyond the limited tests performed by EON.

5. The only ones that stand to benefit from such an amendment would be EON. The licensees will lose and so will the public.

6. We see no possible way for licensees to meet build-out requirements with 100mw systems. To date, not one full scale system has been fully implemented and to think EON could handle all the licensee's requirements is beyond probability.

7. The FCC would need to postpone build-out requirements to allow engineers and manufacturers to adapt to the new amendment. In addition, the FCC would need to extend license renewal dates by approximately 2-4 years.

Could systems designed for mobile use by companies other than EON have all RTU's fixed and mobile operate at 100mw?

1. EON has been awarded a patent for it's 100mw technology. To be compatible with EON's system, RTU's would have to be adapted to EON's specifications. This would require assistance from EON. They may not even be willing to share their technology, in hopes of controlling the entire industry.

2. Manufacturers present research and development would be wasted. Would they want to start all over when it is hard enough to get manufacturers to participate?

3. 100mw technology is extremely complex and completely protected by EON. No manufacturer is going to be able to randomly develop a compatible system to EON's, and with regards to build-out requirements, there just is not enough time to do so.

4. One of our major concerns with system build-out is to find the most simplistic and dependable system possible that can easily be adapted to the many various applications we may need to provide. In short, we are going to provide services that are the most needed and the easiest to deploy first. We expect each market will be unique and plan to provide services accordingly. Therefore at this time, we should not be so concerned on types of services to be developed or proposed. The public will ultimately decide what it wants and how this technology will grow.

General

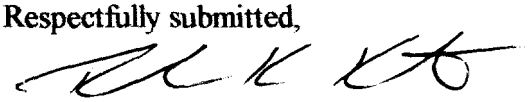
1. The proposal of indirect RTU to RTU interaction will greatly increase interest to the public and should be allowed. The types of ancillary mobile services should remain flexible at this time, licensees are not going to allocate time and money into questionable applications.

2. The prohibition of direct RTU to RTU transmissions should continue. It appears if such transmissions were permitted then licensees would be held accountable for interferences not under their control. Also, this rule precludes licensees from abandoning interactive services.

3. The 5 second per hour duty cycle should be eliminated due to the fact that low cost RTU's are currently available that operate at lower data rates, thus enabling a more rapid deployment of the total IVDS. Additionally as stated above TV-13 is already protected under 47 CFR 95.861. Eliminating this rule will allow subscribers to participate in successive interactive programs, thus better serving the public demands.

June 21, 1995

Respectfully submitted,



Richard K. Kent
ISD President